



Environmental Quality Office
Environmental and Safety Engineering

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REGULATION DEVELOPMENT
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Ford Motor Company
Parklane Towers East
One Parklane Blvd.
Suite 1400
Dearborn, MI 48126-2477

June 17, 1998

Mr. Carlton T. Nash
Chief, Regulation Development Section
Air Programs Branch (AR-18)
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Ford Motor Company Support for the Direct Final Rule Making (63 FR 27492) or
in the Alternative the Notice of Proposed Rule Making (63 FR 27541)

Dear Mr. Nash:

Ford Motor Company submits the following comments supporting the U. S. Environmental Protection Agency's (USEPA) direct final rule making set forth in the Federal Register dated May 19, 1998, at 27492 (63 FR 27492) or in the alternative USEPA's notice of proposed rule making (63 FR 27541). Ford Motor Company is a major domestic manufacturer of automobiles and trucks doing business in the State of Michigan and has standing in matters as an interested effected party.

Although it is Ford Motor Company's belief that Michigan Rule R336.1901 was never approved in or as part of the Michigan State Implementation Plan, we are nonetheless supportive of the action being taken by USEPA to clarify the situation regarding Rule R336.1901. We agree that "the rule does not have a reasonable connection to the national ambient air quality standards (NAAQS) and related air quality goals of the Clean Air Act." This is a State rule that has been used to address odors and other nuisances and is not for purposes of attaining or maintaining any NAAQS nor satisfying any other provision of the Clean Air Act.

Thank you for providing Ford Motor Company this opportunity to comments on this rule making.

Very truly yours,

Joseph F. Lennon, Regional Manager
U. S. Facility Environmental Programs

